Curriculum VITÆ

Sofie E. Miller

PROFESSIONAL EXPERIENCE

The George Washington University Regulatory Studies Center **June 2012 – present**

Senior Policy Analyst June 2014 – present

Policy Analyst June 2012 – June 2014

- Publish quantitative and qualitative research in academic journals, magazines, news media, and agency dockets, including over 20 public interest comments
- Present original research findings at academic conferences, events, and before congressional staff
- Expand the Center's portfolio by identifying new research opportunities, designing methodologies, managing ongoing research projects, and conducting original research on topical regulatory issues
- Serve as a resource to regulatory agencies by independently submitting original research findings through public comments as a part of the public docket on rulemaking
- Sustain and expand the Center's outreach by acting as a regulatory policy information resource for external organizations, national and local media organizations, and policymakers
- Grow the Center from 2 full-time staff to a team of 9 by developing and implementing strategies for organizational growth, including personnel, research, and outreach growth
- Serve as editor-in-chief of the Center's Regulation Digest, which reaches over 1,600 subscribers weekly with breaking news on regulatory developments and policy ideas

Charles Koch Institute **Aug 2010 – June 2012**

Senior Policy Analyst & Research Fellow Jan 2012 – June 2012

Policy Analyst & Research Fellow May 2011 – Jan 2012

Policy Associate Aug 2010 – May 2011

- Started and managed a public interest comment project on DOE, NLRB, and EPA rules
- Directed internal economic analyses on proposed regulations for use in the ongoing public interest comment project
- Researched, wrote, and submitted analyses of federal regulations into the public record
- Managed relationships with external organizations on regulatory issues
- Initiated, developed, and executed a five-week workshop instructing more than 30 Associates on the rulemaking process and methods of effecting changes in regulatory policy
- Developed the Institute's regulatory portfolio through research on administrative procedures

The George Washington University Regulatory Studies Center **June 2010 – Aug 2010**

Regulatory Analysis Intern

- Published a public comment and an op-ed on a proposed Department of Transportation rule
- Contributed research for a public comment to the OMB on Executive Order 12866
- Assisted in research for a scholarly article on the use of science in federal environmental regulations

EDUCATION

George Washington University, Washington, DC
- M.P.P. with a concentration in Regulatory Policy; G.P.A.: 4.0
- *Honors and Awards*: Honors Graduate, Leadership Award, Pi Alpha Alpha

Alfred University, Alfred, NY
- B.A. Political Science with Honors, *Summa Cum Laude*
- *Honors and Awards*: Honors Scholar, Phi Beta Kappa

TESTIMONY & STATEMENTS FOR THE RECORD

Testimony before the U.S. Consumer Product Safety Commission: Hearing on Safety Standard Addressing Blade-Contact Injuries on Table Saws. With Jacob Yarborough. (August 9, 2017)

Statement for the Record for the U.S. Senate Small Business & Entrepreneurship Committee: Examining How Small Businesses Confront and Shape Regulations. With Daniel R. Pérez. (March 19, 2017)

Testimony before the U.S. House Energy and Commerce Subcommittee on Energy and Power: Home Appliance Energy Efficiency Standards under the Department of Energy– Stakeholder Perspectives. (June 10, 2016)

Testimony before the U.S. House Judiciary Task Force on Executive Overreach: The Federal Government on Autopilot: Delegation of Regulatory Authority to an Unaccountable Bureaucracy. (May 24, 2016)

Statement for the Record for the U.S. Senate Environment and Public Works Committee: Oversight of the Renewable Fuel Standard. (February 24, 2016)

PUBLICATIONS

Reforming the Energy Policy and Conservation Act: Learning from Experience on Energy Efficiency, a working paper, June 27, 2017.

"The Risks of Regulating in the Dark," *Federalist Society Review*, Volume 18.

"One Standard to Rule Them All: The Disparate Impact of Energy Efficiency Regulations." *Nudge Theory in Action: Behavioral Design in Policy and Markets*. With Brian F. Mannix. Ed. Sherzod Abdukadirov. Basingstoke, United Kingdom: Palgrave MacMillan, 2016.

The Final Countdown: Projecting Midnight Regulations, a report, with Daniel R. Pérez, July 12, 2016.

"The Disappearing Benefits of Energy Efficiency," *Regulation*, Spring 2016.

"Regulatory Accretion: Causes and Possible Remedies," *Administrative Law Review Accord*, Volume 67, 98-114, with Susan E. Dudley, 2016.

Learning from Experience: Retrospective Review of Regulations in 2014, a working paper, November 3, 2015.

Whose Benefits Are They, Anyway? Examining the Benefits of Energy Efficiency Rules 2007 – 2014, a working paper, September 2, 2015.

"One Discount Rate Fits All? The Regressive Effects of DOE's Energy Efficiency Rule," *Policy Perspectives*, Volume 22, 40-54.

"Looking Back to Move Ahead," *Regulation*, Fall 2014.

"Regressive Furnace Fans," *Regulation*, Spring 2014.

"Making the Social Cost of Carbon More Social," *Regulation*, with Susan E. Dudley & Brian F. Mannix, Winter 2013-2014.

"EPA's Retrospective Review of Regulations: Will it Reduce Manufacturing Burdens?," *Engage*, Vol. 14 Issue 2, 4-14.

"Small Farms, Big Costs," *Regulation*, Fall 2013. With Cassidy B. West.

"Questioning NHTSA's 'Noisy Electric Cars' Rule," *Regulation*, Summer 2013.

EPA's Retrospective Review of Regulations: Will it Reduce Manufacturing Burdens?, a working paper, May 17, 2013.

"Crony Environmentalism," *Regulation*, Spring 2013.

PUBLIC INTEREST COMMENTS

Public Comment on the Consumer Product Safety Commission's Proposed Rule: "Safety Standard Addressing Blade-Contact Injuries on Table Saws." July 26, 2017.

Public Comment on the Department of Energy's Request for Information: "Reducing Regulation and Controlling Regulatory Costs." July 7, 2017.

Public Comment on the Department of Energy's Direct Final Rule: "Energy Conservation Standards for Residential Central Air Conditioners and Heat Pumps." April 25, 2017.

Public Comment on the National Highway Traffic Safety Administration's Federal Automated Vehicles Policy: "Accelerating the Next Revolution in Roadway Safety." With Howard Beales & Daniel R. Pérez. November 16, 2016.

Public Comment to the Commission on Evidence-Based Policymaking. With Marcus Peacock and Daniel R. Pérez. November 8, 2016.

Public Comment on the Department of Energy's Proposed Rule: "Energy Conservation Standards for Manufactured Housing." August 16, 2016.

Public Comment on the Department of Energy's Regulatory Burden Request for Information: "Reducing Regulatory Burden." July 11, 2016.

Public Comment on the Environmental Protection Agency's Proposed Rule: "Renewable Fuel Standard Program: Standards for 2017 and Biomass-Based Diesel Volume for 2018." July 11, 2016.

Public Comment to the National Economic Council on the President's Executive Order 13725: "Steps to Increase Competition and Better Inform Consumers and Workers to Support Continued Growth of the American Economy." With Daniel R. Pérez, Susan E. Dudley & Brian F. Mannix. May 12, 2016.

Public Comment on the Office of Management and Budget's Draft 2015 "Report to Congress on the Benefits and Costs of Federal Regulations." With Susan E. Dudley & Brian F. Mannix. December 15, 2015.

Public Comment on the Environmental Protection Agency's Proposed Rule: "Renewable Fuel Standard Program: Standards for 2014, 2015, and 2016 and Biomass-Based Diesel Volume for 2017." July 24, 2015.

Public Comment on the Department of Energy's Proposed Rule: "Energy Conservation Program: Energy Conservation Standards for Small, Large, and Very Large Air-Cooled Commercial Package Air Conditioning and Heating Equipment." December 1, 2014.

Retrospective Review Comment on the Department of Transportation's Proposed Rule: "Enhanced Tank Car Standards and Operational Controls for High-Hazard Flammable Trains." September 29, 2014.

Public Interest Comment on the Office of Management and Budget's Draft 2014 "Report to Congress on the Benefits and Costs of Federal Regulations." With Susan E. Dudley & Brian F. Mannix. September 2, 2014.

Public Interest Comment on the Department of Energy's Regulatory Burden RFI: "Reducing Regulatory Burden." July 18, 2014.

Retrospective Review Comment on the Department of Energy's Proposed Rule: "Energy Conservation Standards for General Service Fluorescent Lamps and Incandescent Reflector Lamps." June 30, 2014.

Retrospective Review Comment on the Department of Energy's Proposed Rule: "Energy Conservation Standards for Automatic Commercial Ice Makers." May 16, 2014.

Retrospective Review Comment on the Environmental Protection Agency's Proposed Rule: "Standards of Performance for Greenhouse Gas Emissions from New Stationary Sources: Electric Utility Generating Units." May 9, 2014.

Public Interest Comment on the National Highway Traffic Safety Administration's Proposed Rule: "Federal Motor Vehicle Safety Standards; Child Restraint Systems, Child Restraint Systems-Side Impact Protection, Incorporation by Reference." April 23, 2014.

Public Interest Comment on the National Labor Relations Board's Proposed Rule: "Representation Case Procedures." April 7, 2014.

Public Interest Comment on the Environmental Protection Agency's Proposed Rule: "2014 Standards for the Renewable Fuel Standard Program." January 28, 2014.

Public Interest Comment on the Department of Energy's Proposed Rule: "Energy Conservation Standards for Residential Furnace Fans." December 18, 2013.

Public Interest Comment on the Department of Energy's Proposed Rule: "Energy Conservation Standards for Commercial Refrigeration Equipment." November 12, 2013.

Public Interest Comment on Reconsideration of the Department of Energy's Final Rule: "Energy Conservation Standards for Standby Mode and Off Mode for Microwave Ovens." With Susan E. Dudley & Brian F. Mannix. September 6, 2013.

Public Interest Comment on the Food and Drug Administration's Proposed Rule: "Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption." With Cassidy B. West. August 12, 2013.

Public Interest Comment on the Office of Management and Budget's Draft 2013 "Report to Congress on the Benefits and Costs of Federal Regulations." With Susan E. Dudley & Brian F. Mannix. July 23, 2013.

Public Interest Comment on the Department of Energy's Direct Final Rule: "Energy Conservation Standards for Residential Dishwashers." September 14, 2012.

Public Interest Comment on the Department of Transportation's Proposed Rule: "Enhancing Airline Passenger Protections." July 28, 2010.

PRESENTATIONS

Presented "Assessing the Risk of Product Failure in Regulatory Analysis: Case Studies from Energy Efficiency Lawsuits" at the Society for Risk Analysis conference in Arlington, VA, December 12, 2017.

Presented "What's Next for Regulation? Tracking Regulatory Policy in the Trump Era" for the UT Dallas Healthcare Management Executive MBA program in Washington, DC, September 12, 2017.

Presented "Retrospective Review of DOE's Energy Efficiency Standards" at the Benefit Cost Analysis: Advancing Analysis Workshop co-sponsored by the U.S. Department of Agriculture Office of Risk Assessment and Cost-Benefit Analysis, the U.S. Department of Agriculture Economic Research Service, the Society for Benefit-Cost Analysis, and the National Capital Area Chapter of the Society for Risk Analysis in Washington, DC, September 7, 2017.

Presented "Taking a Closer Look at Environmental Regulation" for the Washington Workshops Foundation Congressional Seminar in Washington, DC, June 19, 2017.

Presented "An Inside Look at Regulation: How the Sausage Gets Made & Why it Matters" at the PHCC Legislative Conference in Washington, DC, June 13, 2017.

Moderated the panel *The Congressional Review Act's Sudden Reemergence* at the American Bar Association Administrative Law Institute in Washington, DC, May 19, 2017.

Presented "Benefit-Cost Analysis: Problems with Product Failures" with Arthur G. Fraas at the Society for Benefit-Cost Analysis Conference in Washington, DC, March 16, 2017.

Chaired the panel *Measuring the Effectiveness of Regulations* at the Society for Benefit-Cost Analysis Conference in Washington, DC, March 17, 2017.

Presented "Evidence-based Policy: A Framework for Evidence-based Regulation" at the Society for Benefit-Cost Analysis Conference in Washington, DC, March 16, 2017.

Presented "The True Costs of Energy Efficiency" at the HARDI Elevate'16 Conference in Colorado Springs, Colorado, December 4, 2016.

Presented "One Standard to Rule Them All? The Disparate Impacts of Energy Efficiency Regulation" at the Southern Economics Association Conference in Washington, DC, November 20, 2016.

Presented "The Disappearing Benefits of Energy Efficiency" at the Southern Gas Association Marketing, Customer Experience & Communications Conference in Baltimore, Maryland, August 10, 2016.

Guest Lectured at the American University Washington College School of Law on "Improving Retrospective Review of Regulations" in Washington, DC, July 19, 2016.

Presented "Retrospective Benefit-Cost Analysis of EPA's Renewable Fuel Standard" at the Society for Benefit-Cost Analysis Conference in Washington, DC, March 2016.

Chaired the panel *EPA Implementation of Water Pollution Controls and the Role of Cost-Effectiveness* at the Society for Benefit-Cost Analysis Conference in Washington, DC, March 2016.

Presented "Diagnosing the Problem with Retrospective Review: Proposals for Reform" at the American Bar Association Section of Administrative Law and Regulatory Practice 12th Annual Administrative Law Institute in Washington, DC, March 2016.

Presented "Retrospective Benefit-Cost Analysis of EPA's Renewable Fuel Standard" at the Southern Economic Association Conference in New Orleans, Louisiana, November 2015.

Presented "Whose Benefits Are They, Anyway? Examining Energy Efficiency Rules 2007 – 2014" as keynote speaker of the Air Conditioning, Heating, and Refrigeration Institute's 2015 Annual Meeting in Bonita Springs, Florida, November 2015.

Presented "Do DOE's Energy Efficiency Standards for Furnace Fans Measure Up? Examining Implicit Consumer Discount Rates" at the Association of Private Enterprise Education Conference in Cancun, Mexico, April 2015.

Chaired the panel *Developments in Regulatory Economics* at the Association of Private Enterprise Education Conference in Cancun, Mexico, April 2015.

Chaired the panel *Energy and the Environment* at the Association of Private Enterprise Education Conference in Cancun, Mexico, April 2015.

Presented "Looking Back at Retrospective Review: How Did Agencies Measure Up in 2014?" at the Society for Benefit-Cost Analysis Conference in Washington, DC, March 2015.

Presented "Examining the Benefits of Energy Efficiency Standards" at the Society for Benefit-Cost Analysis Conference in Washington, DC, March 2014.

Presented "Harberger Triangles and Tullock Rectangles: Do Transfers Matter?" at the Society for Benefit-Cost Analysis Conference in Washington, DC, March 2013.

ARTICLES & OP-EDS

"'Drain The Swamp?' Trump Opts For Politics As Usual When It Comes To Ethanol," Forbes, with Susan E. Dudley, October 27, 2017.

"Measuring the Obama Administration's Historic Midnight Surge," *RegBlog* (The Regulatory Review), with Daniel R. Pérez, February 6, 2017.

"Quantitative Models Predict Historic Obama Midnight Surge," *RegBlog* (The Regulatory Review), September 14, 2016.

"EPA Inspector Calls Agency Out On Ethanol Mandate," *Forbes*, with Susan E. Dudley, August 30, 2016.

"Speaker Ryan's Plan Highlights Regulatory Burdens On Low-Income Households," *Forbes*, with Susan E. Dudley, June 14, 2016.

"Competitive Markets Need A Neutral Referee, Not A Cheerleader," *Forbes*, with Susan E. Dudley, May 16, 2016.

"Regulations need retrospective review," *The Hill*, November 5, 2015.

"RFS hurts the Economy," *The Hill*, June 11, 2015

"Paul Ryan Anti-Poverty Plan Targets Regressive Regulation," *Roll Call*, August 6, 2014

"Controversial food safety rule shows why more transparency is needed at FDA," *Washington Examiner*, with Cassidy B. West, January 19, 2014

"Antisocial genesis of the social cost of carbon," *Reuters*, with Susan E. Dudley and Brian F. Mannix, October 10, 2013

"Is Obama Really Reducing Regulatory Burdens?," *Washington Examiner*, with Susan E. Dudley, May 2, 2013

"Government by regulation: So much for 'transparency'," *Washington Times*, with Susan E. Dudley, March 21, 2013